



THE CITY OF NEW YORK  
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November 23, 2022

**By ECF**

The Honorable Nelson S. Roman  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: Frey v. Bruen, et al., 21-cv-5334 (NSR)

Dear Judge Roman:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, counsel for Defendants, the City of New York (“City”) and Keechant Sewell, Commissioner of the New York City Police Department (“NYPD”), named in her official capacity (collectively, “City Defendants”), in the above-referenced action.

I am writing to seek a two (2) day extension of time – from November 28, 2022 to November 30, 2022 – to serve opposition papers to plaintiffs’ motion for a preliminary injunction. The State Defendants join in this request as well. Due to the upcoming holiday weekend, the City Defendants require two additional days for internal and client review of the City’s opposition papers. This is the City’s second request for an extension. The State of New York made the first request for an extension on behalf of both City and State Defendants. Your Honor granted that request by Order dated October 28, 2022 (see ECF Doc. No. 58). We contacted plaintiffs’ counsel earlier this week, but we have not yet heard back regarding plaintiffs’ position. Accordingly, we respectfully request that Defendants’ opposition papers be served on November 30, 2022.

Respectfully submitted,  
*/s/ Rachel K. Moston*  
Rachel K. Moston

cc: Amy Bellantoni, Esq. (via ECF)  
Suzanna Publicker Mettham, Esq. (via ECF)